

EXHIBIT J

8/25

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Attorneys for Moving Non-Party

AMERICAN REGISTRY FOR INTERNET NUMBERS, LTD.

RECEIVED UNITED STATES DISTRICT COURT
 NORTHEN DISTRICT
 AUG 25 2006
 SAN JOSE DIVISION

CLERK U.S. DISTRICT COURT
 GRAY KREMEN, CALIFORNIA
 SAN JOSE

Plaintiff,

vs.

STEPHEN MICHAEL COHEN, et. al,
 Defendant.

Case No C98-20718 JW
 [Related to Case No. C 06-2554 JW]

**STIPULATED REQUEST AND
 [PROPOSED] ORDER CONTINUING THE
 HEARING ON NON-PARTY AMERICAN
 REGISTRY OF INTERNET NUMBERS,
 LTD.'S: MOTION FOR CLARIFICATION,
 OR, IN THE ALTERNATIVE, FOR
 MODIFICATION OF THE ORDER
 DATED SEPTEMBER 17, 2001, ENTITLED
 "ORDER RE: REGISTRATION OF IP
 NUMBERS (NETBLOCKS) IN THE NAME
 OF JUDGMENT CREDITOR**

WHEREAS, moving non-party American Registry of Internet Numbers, LTD's ("ARIN")
 Motion For Clarification, Or, In The Alternative, For Modification Of The Order Dated
 September 17, 2001, Entitled "Order Re: Registration Of IP Numbers (NETBLOCKS) In The

1 Name Of Judgment Creditor ("Motion to Clarify/Modify") is currently set for hearing on
2 September 11, 2006 before the Honorable James Ware;

3 Whereas Plaintiff Gary Kremen ("Plaintiff") filed his Opposition to ARIN's Motion to
4 Clarify\Modify on August 21, 2006;

5 WHEREAS, Plaintiff's August 21, 2006, Opposition to the Motion to Clarify\Modify
6 requested a further briefing and hearing to review certain information in ARIN's possession;

7 WHEREAS, the parties believe it is judicially efficient to afford ARIN an opportunity to
8 produce information requested by Plaintiff and for Plaintiff to file a supplemental brief relating
9 thereto;

10 WHEREAS, the parties have come to an agreement regarding the production and review
11 of information in ARIN's possession, continuation of the current September 11 hearing and
12 August 28 Reply deadline, a schedule for the filing of (and page limitations for) a supplemental
13 brief from Plaintiff and a singular Reply brief from ARIN on Plaintiff's Opposition and the to-be-
14 filed supplemental brief, and a continued hearing date regarding same; and

15 WHEREAS, in the interest of convenience and efficient judicial administration of
16 resources, the parties are concurrently seeking in the related case pending in this Court entitled
17 *Kremen v. American Registry for Internet Numbers, Ltd.*, Case No. 06-2554 JW, a stipulated
18 continuance under separate application of the current September 11, 2006, hearing date and
19 briefing deadlines on ARIN's Motion To Dismiss Plaintiff's Complaint Pursuant to 12(b)(6), Or,
20 Alternatively, For A Stay and Case Management Conference, to coincide with the schedule set
21 forth in this stipulated application.

22 WHEREFORE, it is hereby stipulated by the parties through their respective counsel that:

23 (1) the current September 11, 2006, hearing and the August 28, 2006, Reply deadline on
24 ARIN's Motion to Clarify\Modify shall be continued;

25 (2) ARIN will produce certain information to Plaintiff in the form set forth in the attached
26 Exhibits A and B no later than 5:30 p.m. on September 7, 2006, at the Law Offices of
27 Kronenberger Hanley, LLP, 220 Montgomery Street, Suite 1920, San Francisco, California
28 94104;

1 (3) Plaintiff will be allowed to file and personally or electronically serve a supplemental
2 brief on the Motion to Clarify/Modify (not to exceed 15 pages) relating solely and exclusively to
3 the information produced by ARIN pursuant to this Stipulation (and no other issues) by
4 September 18, 2006;

5 (4) ARIN's Reply brief (not to exceed 25 pages) responding to Plaintiff's August 21,
6 2006, Opposition and Plaintiff's to-be-filed supplemental brief must be filed and personally or
7 electronically served no later than October 2, 2006;

8 (5) the hearing date on ARIN's Motion to Clarify/Modify shall be continued to October
9 23, 2006, at 9:00 a.m., or as soon thereafter as may be heard, as determined by the Court's
10 availability. (The parties are also available on October 24, 25, and 26, 2006.)

11 Dated: August 25, 2006

MANATT, PHELPS & PHILLIPS, LLP
STEPHEN M. RYAN
CHAD S. HUMMEL
JACK S. YEH

13 By: 

Jack S. Yeh

14
15 *Counsel for Moving Non-Party*
16 AMERICAN REGISTRY FOR INTERNET NUMBERS,
LTD.

17
18 Dated: August 25, 2006

IDELL & SEITEL LLP
RICHARD J. IDELL
ORY SANDEL

19
20
21 By: 

Richard J. Idell
Ory Sandel

22
23 *Counsel for Plaintiff*
24 GARY KREMEN
25
26
27
28

ORDER

Pursuant to the foregoing stipulation and good cause appearing therefor, it is hereby ORDERED as follows:

(1) the current September 11, 2006, hearing and the August 28, 2006, Reply deadline on ARIN's Motion to Clarify/Modify shall be continued;

(2) ARIN will produce certain information to Plaintiff in the form set forth in the attached Exhibits A and B no later than 5:30p on September 7, 2006, at the Law Offices of Kronenberger Hanley, LLP, 220 Montgomery Street, Suite 1920, San Francisco, California 94104;

(3) Plaintiff will be allowed to file and personally or electronically serve a supplemental brief on the Motion to Clarify/Modify (not to exceed 15 pages) relating solely and exclusively to the information produced by ARIN pursuant to this Stipulation (and no other issues) by September 18, 2006;

(4) ARIN's Reply brief (not to exceed 25 pages) responding to Plaintiff's August 21, 2006, Opposition and Plaintiff's to-be-filed supplemental brief must be filed and personally or electronically served no later than October 2, 2006;

(5) the hearing date on ARIN's Motion to Clarify/Modify shall be continued to **October 23, 2006, at 9:00 a.m.**, or as soon thereafter as may be heard, as determined by the Court's availability.

IT IS SO ORDERED.

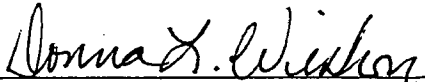
Dated _____, 2006

The Honorable James Ware
United States District Court Judge

1 am aware that on motion of the party served, service is presumed invalid if postal cancellation
2 date or postage meter date is more than one day after date of deposit for mailing in affidavit.

3 I declare that I am employed in the office of a member of the bar of this court at
4 whose direction the service was made.

5 Executed on August 25, 2006.

6 
7 Donna L. Wishon

PROOF OF SERVICE

I, Donna L. Wishon, declare:

I am a resident of the State of California and over the age of eighteen years, and not a party to the within action; my business address is 1001 Page Mill Road, Building 2, Palo Alto, CA 94304-1006. On August 25, 2006, I served the within documents:

STIPULATED REQUEST AND [PROPOSED] ORDER CONTINUING THE HEARING ON NON-PARTY AMERICAN REGISTRY OF INTERNET NUMBERS, LTD.'S: MOTION FOR CLARIFICATION, OR, IN THE ALTERNATIVE, FOR MODIFICATION OF THE ORDER DATED SEPTEMBER 17, 2001, ENTITLED "ORDER RE: REGISTRATION OF IP NUMBERS (NETBLOCKS) IN THE NAME OF JUDGMENT CREDITOR

- ☐ by transmitting via e-mail the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m.
- ☒ by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Palo Alto, California addressed as set forth below.
- ☐ by placing the document(s) listed above in a sealed Federal Express envelope and affixing a pre-paid air bill, and causing the envelope to be delivered to a Federal Express agent for delivery.
- ☐ by personally delivering the document(s) listed above to the person(s) at the address(es) set forth below.

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 (attorney for S. Cohen)

I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I

PROOF OF SERVICE

EXHIBIT A

Exhibit A: Documents to be Produced by ARIN

All of the following information must be produced by ARIN as verified under oath:

1. Any documentation of any and allocations to Cohen or Cohen-related entities or alter-ego entities ("Cohen") (as detailed in Exhibit B), and when they occurred.

2. Any documentation of any contracts or terms associated with any allocations identified pursuant to item one above, or confirmation that no such contracts or terms exist.

3. Any documentation of which Netblocks or ASN's are associated with the contracts produced via fax by ARIN to Kremen on August 22, 2006 ("Contracts").

4. Any documentation of any prior or subsequent contracts, modifications, renewals, or other additional writings related to the Contracts produced, including any documentation of any such agreements made orally, or confirmation that no such documents exist.

5. Documentation that the forms of the Contracts were standard form service agreement contracts of ARIN at the dates the Contracts were signed, or else documentation of such other standard terms and conditions.

6. All correspondence, including email, and billing documents relating to the Contracts and any other allocations to Cohen or any Cohen entity or alter-ego entity, or confirmation under oath that all such documents have already been provided to Kremen.

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EXHIBIT B

Exhibit B: Cohen Alter Ego and Affiliate Companies

1. Pacnet, Incorporated, a California corporation; Pacnet, Inc., a Nevada corporation; Pacnet, S.A. de C.V., a Mexican corporation; or similar permutations thereof containing the name "Pacnet" or "Pac Net"
2. WLCOM, S.A. de C.V a.k.a. WL Com Del Noroeste, SA de CV a.k.a. WL Com a.k.a. WL Com Del Noroeste, a Mexican corporation, WL Com; or similar permutations thereof including but not limited to WLCOM, W1 Com, WL Com del Noroeste, S.A. de C.V. containing the string of characters "wl com" or "wlcom" or "wl.com" or "w1com"
3. Speednet Ltd., a Vanuatu corporation a.k.a. Speednet, an Israeli company, a.k.a. Speednet, a Palestinian company
4. Mexico Lending, Ltd., a Nevada corporation
5. Fastcalled, Inc., a California corporation
6. Sandman Internacional Limited, S.A. de C.V., a Mexican corporation a.k.a. Sand Man International, S.A., a Mexican corporation, or Sandman International, Ltd.; or similar permutations thereof containing the name "Sand Man" or "Sandman"
7. Omnitec a.k.a. Omnitec International, a Nevada corporation, a.k.a. Omnitec Internacional, Omnitech International, Omnitech Internacional, Omni Tec, Omni Tech or similar permutations thereof containing the words "omni" and "tec" or "tech"
8. Ocean Fund International, Ltd, a British Virgin Islands company, Ocean Fund Internacional, Ocean Fun International, or similar permutations thereof containing the words "ocean" and "fund" or "fun"
9. International Sea Farms, Inc., a Nevada corporation
10. Montano Properties, LLC
11. Pinche Galicot, Inc., a Nevada corporation
12. Ezcallme.com
13. Earth Station V or Earth Station 5 or EarthStationV or EarthStation5 or similar permutations thereof containing the words "earth," "station" and the number "five"
14. Ynata, Ltd., a British Virgin Islands company; Yanata, Ltd.; or similar permutations thereof
15. First City Financial Corp., state of incorporation unknown

1 16. Sporting Houses Management Corp., a Nevada company; Sporting Houses of America, a
2 Nevada company; Sporting Houses General, Inc., a Nevada company; or similar
3 permutations of the words "sporting" and "houses"

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